

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES OF AMERICA,

v.

Criminal No. 1:19-cr-59 (LO)

DANIEL EVERETTE HALE,

Defendant.

**DEFENDANT'S NOTICE OF FILING OF MEMORANDA
OF UNDERSTANDING REGARDING CLASSIFIED INFORMATION**

In accordance with the Protective Order Pertaining to Classified Information entered by this Court on May 23, 2019 (dkt. # 29), defense counsel hereby submits the attached two Memoranda of Understanding, executed by Preston Burton, Esq., and Joshua C. Felty, Esq., regarding the handling of classified information. Pursuant to the Protective Order (Paragraph 15), an executed copy of the attached Memoranda of Understanding will be served upon counsel for the United States. Mr. Burton and Mr. Felty are representing Mr. Hale for purposes of seeking Executive clemency; they have both been granted sufficient clearance to be permitted access to classified information. Government counsel has been made aware that Mr. Burton and Mr. Felty are seeking access to the classified information that was produced to defense counsel, and does not object to their being granted access pursuant to the Protective Order.

Respectfully submitted,

DANIEL EVERETTE HALE

By Counsel,

By: /s/ Todd M. Richman

Todd M. Richman

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CERTIFICATE OF SERVICE

I hereby certify that on February 10, 2022, I will electronically file the foregoing pleading with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing (NEF) to counsel of record.

By: /s/ Todd M. Richman
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